

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:)
)
CIRCUIT CITY STORES, INC., *et al.*,) Case No.: 08-35653-KRH
Debtors.) Chapter 11

**SUPPLEMENTAL VERIFIED STATEMENT OF ATTORNEYS FOR
CREDITORS PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

COME NOW William A. Gray, Esquire; C. Thomas Ebel, Esquire; Peter M. Pearl, Esquire; and William Ashley Burgess, Esquire; and the law firm of Sands, Anderson, Marks & Miller, P.C. (“Sands Anderson”), as counsel for the parties in interest and/or creditors listed on **EXHIBIT A** attached hereto and incorporated herein by reference (collectively, the “Current Clients”), and now counsel for an additional party in interest and/or creditor identified herein, asserting claims against Circuit City Stores., *et al.*, and certain of its affiliated Debtors (collectively, the “Debtors”), and make the following verified statement pursuant to *Federal Rule of Bankruptcy Procedure 2019*.

William A. Gray, Esquire – VSB #46911
W. Ashley Burgess, Esquire – VSB # 67998
C. Thomas Ebel, Esquire – VSB #18637
Peter M. Pearl, Esquire – VSB #22344
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Counsel for: Reverend Dwayne Funches, individually, and as Independent Executor of the Estates of Travis Funches, Dione Funches, and Dwayne Funches, Jr., Emily Funches, Lovera S. Funches, and Shatira Funches, individually; Cynthia Olloway, Individually and as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor; Monument Consulting, LLC; McAlister Square Partners, Ltd; Mansfield SEQ 287 and Debbie, Ltd.; UTC I, LLC; PrattCenter, LLC; Valley Corners Shopping Center, LLC; Encinitas PFA, LLC; Cardinal Court, LLC; Phyllis M. Pearson; T.J.Maxx of CA, LLC; Baker Natick Promenade LLC; BPP-Conn LLC, f/k/a WEC 95B Manchester Limited Partnership; BPP-Muncy, LLC; BPP-NY LLC; BPP-OH LLC; BPP-Redding LLC; BPP-SC LLC; The Stop & Shop Supermarket Company; BPP-VA, LLC; BPP-WB LLC; Colonial Heights Holdings, LLC; E&A Northeast Limited Partnership; Ray Mucci's, Inc.; Interstate Augusta, LLC; NPP Development, LLC; Route 146 Millbury, LLC; Alexander's of Rego Park Center, Inc.; Amherst VF LLC; BevCon I, LLC; Vornado Caguas LP; East Brunswick VF LLC; Green Acres Mall, LLC; Vornado Gun Hill Road LLC; Marlton VF, LLC; North Bergen Tonnelle Plaza, LLC; North Plainfield VF, LLC; Wayne VF LLC a/k/a Star Universal; Towson VF LLC; VNO Mundy Street LLC; VNO Tru Dale Mabry, LLC; Christopher Borlgin; Paul Schaapman; CSI Construction Company; Hilton Ellis Epps, Sr.; Chatham County, Georgia Tax Commissioner; DEV Limited Partnership; Kelly Breitenbecher; A.D.D. Holdings, L.P.; Hillson Electric Incorporated; John Rohrer Contracting Company, Inc.; Lang Construction, Inc.; and Rebecca Hylton DeCamps, Denon Electronics, Snell Acoustics, Inc., Mid-American Insulation, Inc., Midwest Block & Brick, Inc., McCorkendale Construction, Premier Contracting, Inc., Lee County, Mississippi Tax Collector, DeSoto County, Mississippi, Sensormatic Electronic Corporation, and OmniMount Electronics, Inc.

1. Sands Anderson's Current Clients' names are set forth on **EXHIBIT A** attached hereto and incorporated herein by reference. Prior statements pursuant to *Federal Rules of Bankruptcy Procedure* 2019 ("2019 Statements") have been filed pertaining to the Current Clients. Sands Anderson hereby supplements the previous 2019 Statements.

2. Sands Anderson has now been retained by an additional creditor, whose name, address and a brief explanation of its interests are as follows (the "New Client"):

a. OmniMount Systems, Inc.
c/o Therese A. Scheuer, Esquire
ROPES & GRAY LLP
One International Place
Boston, MA 02110-2624
Phone: (617) 235-4910
Fax: (617) 235-9915

Nature of Interest: Rights and remedies in connection with leased and/or purchase money security interest. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.

3. The facts and circumstances relating to the employment of Sands, Anderson by the New Clients are that Sands Anderson serves as bankruptcy counsel to the New Client to represent its interest in the Debtors' jointly-administered bankruptcy cases. The New Client is billed monthly at the Sands Anderson's normal hourly rates for its shareholders, counsel, associates, and legal assistants for time spent and for costs incurred in providing legal services, pursuant to Sands, Anderson's standard terms and engagement.

4. The New Client has been advised of, and has consented to, Sands Anderson's representation of all other clients.

5. Sands Anderson reserves the right to supplement and/or amend this Statement at any time in the future.

Respectfully Submitted,

SANDS, ANDERSON, MARKS & MILLER, P.C.

/s/ William A. Gray

William A. Gray, Esquire – VSB #46911
C. Thomas Ebel, Esquire – VSB #18637
Ashley Burgess, Esquire – VSB # 67998
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Richmond, Virginia 23218-1998
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(804) 783-7291 Facsimile
Counsel for: A.D.D. Holdings, L.P.; Alexander's of Rego Park Center, Inc.; Amherst VF LLC; Baker Natick Promenade LLC; BevCon I, LLC; Christopher Borglin; BPP-Conn LLC, f/k/a WEC 95B Manchester Limited Partnership; BPP Muncy, LLC; BPP-NY LLC; BPP-OH LLC; BPP-Redding LLC; BPP-SC LLC; BPP-VA LLC; BPP-WB LLC; Kelly Breitenbecher; Cardinal Court, LLC; Chatham County, Georgia Tax Commissioner; Colonial Heights Holdings, LLC; CSI Construction Company; DEV Limited Partnership; Rebecca Hylton DeCamps, Denon Electronics, DeSoto County, Mississippi; E&A Northeast Limited Partnership; East Brunswick VF LLC; Encinitas PFA, LLC; Hilton Ellis Epps, Sr.; Reverend Dwayne Funches, individually, and as Independent Executor of the Estates of Travis Funches, Dione Funches, and Dwayne Funches, Jr., Emily Funches, Lovera S. Funches, and Shatira Funches, individually; Green Acres Mall, LLC; Hillson Electric Incorporated; Interstate Augusta, LLC; Lang Construction, Inc.; Lee County, Mississippi Tax Collector; Mansfield SEQ 287 and Debbie, Ltd.; Marlton VF, LLC; McAlister Square Partners, Ltd.; McCorkendale Construction; Mid-American Insulation, Inc.; Midwest Block & Brick, Inc.; Monument Consulting, LLC; NPP Development, LLC; North Bergen Tonnelle Plaza, LLC; North Plainfield VF, LLC; Cynthia Olloway, Individually and as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor; OmniMount Systems, Inc.; Phyllis M. Pearson; PrattCenter, LLC; Premier Contracting, Inc.; Ray Mucci's, Inc.; Route 146 Millbury, LLC; John Rohrer Contracting Company, Inc.; Paul Schaapman; Sensormatic Electronic Corporation; Snell Acoustics, Inc.; The Stop & Shop Supermarket Company; T.J. Maxx of CA, LLC; Towson VF LLC; UTC I, LLC; Valley Corners Shopping Center, LLC; Vornado Caguas LP; Vornado Gun Hill Road LLC; Wayne VF LLC a/k/a Star Universal; VNO Mundy Street LLC; and VNO Tru Dale Mabry, LLC.

VERIFICATION

I, William A. Gray, an attorney with Sands Anderson Marks & Miller, P.C., after due inquiry declare under penalty of perjury, and pursuant to 28 U.S.C. § 1746, that the facts and representations set forth in this Verified Statement in accordance with Bankruptcy Rule 2019 are true and correct to the best of my knowledge and belief.

/s/ William A. Gray

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September, 2009, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter.

/s/ William A. Gray

EXHIBIT A TO RULE 2019 STATEMENT

Creditor
Reverend Dwayne Funches, Individually
Reverend Dwayne Funches as Independent Executor of the Estate of Travis Funches
Reverend Dwayne Funches as Independent Executor of the Estate of Dione Funches
Reverend Dwayne Funches as Independent Executor of the Estate of Dwayne Funches, Jr.
Emily Funches, Individually
Lovera S. Funches, Individually
Shatira Funches, Individually
Cynthia Olloway, Individually
Cynthia Olloway, as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor
Monument Consulting, LLC
McAlister Square Partners, Ltd.
Mansfield SEQ 287 and Debbie, Ltd.
UTC I, LLC
PrattCenter, LLC
Valley Corners Shopping Center, LLC
Encinitas PFA, LLC
Cardinal Court, LLC
Phyllis M. Pearson
T.J. Maxx of CA, LLC
Baker Natick Promenade LLC
BPP-Conn LLC, f/k/a WEC 95B Manchester Limited Partnership
BPP-Muncy, LLC
BPP-NY LLC
BPP-OH LLC
BPP-Redding LLC
BPP-SC LLC
The Stop & Shop Supermarket Company
BPP-VA LLC
BPP-WB LLC
Colonial Heights Holdings, LLC
E&A Northeast Limited Partnership
Ray Mucci's, Inc.
Interstate Augusta, LLC
NPP Development, LLC
Route 146 Millbury, LLC
Alexander's of Rego Park Center, Inc.
Amherst VF LLC
BevCon I, LLC
Vornado Caguas LP
East Brunswick VF LLC
Green Acres Mall, LLC
Vornado Gun Hill Road LLC

Creditor
Marlton VF, LLC
North Bergen Tonnelle Plaza, LLC
North Plainfield VF, LLC
Star Universal LLC
Towson VF LLC
VNO Mundy Street LLC
VNO Tru Dale Mabry, LLC
Christopher Borglin
Paul Schaapman
CSI Construction Company
Kelly Breitenbecher
Hilton Ellis Epps, Sr.
DEV Limited Partnership
Chatham County, Georgia Tax Commissioner
A.D.D. Holdings, L.P.
Hillson Electric Incorporated
John Rohrer Contracting Company, Inc.
Lang Construction, Inc.
Rebecca Hylton DeCamps
Denon Electroics, USA
Snell Acoustics, Inc.
Mid-American Insulation, Inc.
Midwest Block & Brick
McCorkendale Construction
Premier Contracting, Inc.
Lee County, Mississippi Tax Collector
DeSoto County, Mississippi
Sensormatic Electronic Corporation
OmniMount Systems, Inc.